

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)

BP EXPLORATION & PRODUCTION INC.’S WITNESS AND EXHIBIT LIST

BP Exploration & Production Inc. (“BP”) files this Witness and Exhibit List identifying those individuals that may be called as witnesses and exhibits that may be introduced at the hearing on (i) *Motion of BP Exploration & Production Inc. for Entry of An Order Pursuant to 11 U.S.C. Section 362(d) Authorizing Relief From the Automatic Stay to Commence Arbitration Against the Debtors* (the “Stay Motion”), [Docket No. 1414] and (ii) *Motion of BP Exploration & Production Inc. to Quash Debtors’ Bankruptcy Rule 2004 Discovery Requests* (the “Motion to Quash”), [Docket No. 1415], scheduled for **July 9, 2021, at 10:00 a.m.** (prevailing Central Time) (the “Hearing”).

A. WITNESSES

In connection with the Hearing, BP may call any one or more of the following individuals to provide testimony:

1. Any witness necessary to authenticate a document;
2. Any witness designated or called by any other party; and
3. Any impeachment or rebuttal witness.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

B. EXHIBITS

In connection with the Hearing, BP may seek to introduce into evidence any one or more of the following documents:

Ex. #	Description	Offered	Obj.	Admitted	Disposition
1.	Declaration of Craig A. Duewall in Support of BP Exploration & Production Inc. for Entry of An Order Pursuant to 11 U.S.C. Section 362(d) Authorizing Relief from the Automatic Stay to Commence Arbitration Against the Debtors [Docket No. 1414-2]				
2.	Galapagos Area Loop Subsea Production System Construction and Operating Agreement, dated December 1, 2011, as amended from time to time, (the “LSPS OA”) – Exhibit A1 to the Stay Motion [Docket No. 1414-3] and Exhibit B1 to the Motion to Quash [Docket No. 1415-2]				
3.	Dispute Resolution Procedure, which is Exhibit F to the LSPS OA – Exhibit A2 to the Stay Motion [Docket No. 1414-4]				
4.	Excerpt of the Transcript from the Court’s April 9, 2021 Hearing, Page 27, Lines 17-19 – Exhibit A3 to the Stay Motion [Docket No. 1414-5] and Exhibit B2 to the Motion to Quash [Docket No. 1415-3]				
5.	Excerpt of the Transcript from the Court’s May 6, 2021 Hearing, Page 42, Lines 18-23 – Exhibit A4 to the Stay Motion [Docket No. 1414-6] and Exhibit B3 to the Motion to Quash [Docket No. 1415-4]				

Ex. #	Description	Offered	Obj.	Admitted	Disposition
6.	Excerpt of the Deposition Transcript of Mr. Michael Dane, Page 273, Lines 2-7 – Exhibit A5 to the Stay Motion [Docket No. 1414-7] and Exhibit B4 to the Motion to Quash [Docket No. 1415-5]				
7.	Letter from John H. Smith, Senior Vice President – Business Development for the Debtors, to Danielle Scott, Business Partner – Land for BP, dated May 14, 2021 – Exhibit A6 to the Stay Motion [Docket No. 1414-8] and Exhibit B5 to the Motion to Quash [Docket No. 1415-6]				
8.	Letter from Danielle Scott, Business Partner – Land for BP to John H. Smith, Senior Vice President – Business Development for the Debtors dated May 19, 2021 – Exhibit A7 to the Stay Motion [Docket No. 1414-9] and Exhibit B6 to the Motion to Quash [Docket No. 1415-7]				
9.	Letter from Paul R. Genender, counsel to the Debtors, to Craig Duewall, counsel to BP dated May 21, 2021 – Exhibit A8 to the Stay Motion [Docket No. 1414-10] and Exhibit B7 to the Motion to Quash [Docket No. 1415-8]				
10.	Letter from Craig Duewall, counsel to BP, to Paul R. Genender, counsel to the Debtors, dated May 21, 2021 – Exhibit A9 to the Stay Motion [Docket No. 1414-11] and Exhibit B8 to the Motion to Quash [Docket No. 1415-9]				

Ex. #	Description	Offered	Obj.	Admitted	Disposition
11.	Letter from Paul R. Genender, counsel to the Debtors, to Craig Duewall, counsel to BP, dated May 24, 2021- Exhibit A10 to the Stay Motion [Docket No. 1414-12] and Exhibit B9 to the Motion to Quash [Docket No. 1415-10]				
12.	<i>Disclosure Statement for Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors</i> (without exhibits and schedules) [Docket No. 1285]				
13.	Any exhibit designated by any other party				
14.	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case				
15.	Any impeachment or rebuttal exhibits				

BP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. BP also reserves the right to rely upon and use as evidence additional documents produced by the Debtors or any other party in interest.

Dated: July 7, 2021

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen

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– and –

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Counsel for BP Exploration & Production Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 7, 2021, a true and correct copy of the foregoing Witness and Exhibit List was served by electronic mail via the Court's ECF system to all parties authorized to receive notice in this case.

By: /s/ Shari L. Heyen
Shari L. Heyen